

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Mark S. Horoupian (CA Bar No. 175373) <i>mark.horoupian@gmlaw.com</i> Steven F. Werth (CA Bar No. 205434) <i>steven.werth@gmlaw.com</i> GREENSPOON MARDER LLP 1875 Century Park East, Suite 1900 Los Angeles, California 90067 Telephone: 213.626.2311 Facsimile: 954.771.9264</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for Howard M. Ehrenberg, Chapter 7 Trustee</p>	<p>FOR COURT USE ONLY</p>
<p align="center">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:</p> <p>SPECTRUM LINK, INC.,</p> <p align="center">Debtor.</p> <p align="right">Debtor(s)</p> <p>HOWARD M. EHRENBURG, Chapter 7 Trustee,</p> <p align="right">Plaintiff(s),</p> <p align="center">vs.</p> <p>WILLIAM WALTER WRIGHT, an individual, AMY BARROWS-WRIGHT, aka AMY BARRIOS-WRIGHT, an individual, AWB CONSULTING LLC, a California limited liability company, ENUMAH GROUP, LLC, a California limited liability company, NEW BEGINNINGS APOSTOLIC COMMUNITY CHURCH, INC., a California corporation, SLOANE STREET, LLC, a Delaware limited liability company, and OLD WORLD ANTIQUITIES LLC, a California limited liability company,</p> <p align="right">Defendants.</p>	<p>CASE NO.: 2:21-bk-16403-VZ CHAPTER: 7 ADVERSARY NO.: 2:23-ap-01165-VZ</p> <p>NOTICE OF LODGMENT OF ORDER OR JUDGMENT IN ADVERSARY PROCEEDING RE: EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION (title of motion¹)</p>

¹ Please abbreviate if title cannot fit into text field

PLEASE TAKE NOTE that the order or judgment titled **TEMPORARY RESTRAINING ORDER,
ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION** was lodged on (date) June 8,
2023 and is attached. This order relates to the motion which is docket number 2.

EXHIBIT A

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6 Attorneys for Howard M. Ehrenberg,
Chapter 7 Trustee
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**

11 In re:
12 SPECTRUM LINK, INC.,
13 Debtor.

Case No. 2:21-bk-16403-VZ

Chapter 7

Adversary No.: 2:23-ap-01165-VZ

14 HOWARD M. EHRENBERG, Chapter 7
15 Trustee,

**TEMPORARY RESTRAINING
ORDER, ORDER TO SHOW CAUSE
RE: PRELIMINARY INJUNCTION**

16 Plaintiff,

OSC Hearing: July 13, 2023, at 11:00
a.m.

17 vs.

Date: June 8, 2023
Time: 11:00 a.m.
Place: Courtroom 1368
255 East Temple Street
Los Angeles, CA 90012
The Hon. Vincent Zurzolo

18 WILLIAM WALTER WRIGHT, an
individual, AMY BARROWS-WRIGHT,
19 aka AMY BARRIOS-WRIGHT, an
individual, AWB CONSULTING LLC, a
20 California limited liability company,
ENUMAH GROUP, LLC, a California
21 limited liability company, NEW
BEGINNINGS APOSTOLIC
22 COMMUNITY CHURCH, INC., a
California corporation, SLOANE
23 STREET, LLC, a Delaware limited
liability company, and OLD WORLD
24 ANTIQUITIES LLC, a California limited
liability company,

25 Defendants.
26
27
28

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1 On June 5, 2023, Plaintiff Howard M. Ehrenberg ("Trustee") the chapter 7 trustee
2 of Spectrum Link, Inc. ("Debtor") filed his "Emergency Motion For Temporary
3 Restraining Order And Order To Show Cause Re: Preliminary Injunction" (Docket No.
4 2, the "Motion") in the above-captioned adversary proceeding. The Trustee also filed a
5 notice of hearing of the Motion (Docket No. 3, the "Notice"), notifying parties of certain
6 Court-set opposition and reply deadlines, and stating that the Motion was set for hearing
7 on June 8, 2023, at 11:00 a.m. (the "Hearing").

8 On June 7, 2023, Mr. William Walter Wright ("Mr. Wright") served an opposition
9 to the Motion on the Trustee, which Mr. Wright caused to be filed the following day
10 (Docket No. 9, the "Opposition"). On June 7, 2023, the Trustee filed and served a reply
11 to the Opposition (Docket No. 7, the "Reply"). The Trustee also filed a declaration of
12 service (Docket No. 6, the "Service Declaration") relating to his efforts to provide notice
13 of the Hearing, the Motion, the Notice, and relevant deadlines to the above-captioned
14 defendants (the "Defendants").

15 The Motion came for hearing before the Court on an emergency basis, on June 8,
16 2023, at 11:00 a.m., the Honorable Vincent P. Zurzolo presiding. Mr. Christopher
17 Ellison, Esq. appeared telephonically on behalf of Mr. Wright. Ms. Noreen Madoyan,
18 Esq. appeared telephonically on behalf of the Office of the United States Trustee. Mr.
19 Steven F. Werth, Esq., appeared in person on behalf of the Trustee. Mr. Howard M.
20 Ehrenberg, Esq. appeared telephonically on behalf of himself. There were no other
21 appearances.

22 The Court, having considered the Motion, the declaration in support of the
23 Motion, the exhibits attached to the Motion, the Notice, the Service Declaration, the
24 Opposition, the declaration of Mr. Wright in support of the Opposition, the Reply, related
25 documents filed in this adversary proceeding, and arguments of counsel presented to the
26 Court at the Hearing as reflected on the record, makes the following findings of fact:

27
28

FINDINGS OF FACT:

1. As the Motion does not seek a temporary restraining order ("TRO") or order to show cause regarding whether an injunction should issue ("OSC") without written or oral notice to the adverse party pursuant to Fed. R. Civ. P. 65(b) and Fed. R. Bankr. P. 7065, the provisions of Fed. R. Civ. P. 65(b) do not apply to the Motion.

2. The Motion and Notice were properly served upon the Defendants.

3. The Notice contained information that properly identified the date, time, and location of the Hearing, as well as the deadline for parties to file an opposition to the Motion.

4. The Opposition was not timely filed, as it was filed after the deadline identified in the Notice.

5. The Opposition was not timely served, as it was served after the deadline identified in the Notice.

6. The Trustee timely filed and served the Reply.

7. The evidence cited in support of the Motion is detailed, significant, and directly on point.

8. The Trustee has carried his burden of showing that a TRO should issue against the Defendants, as the Trustee has demonstrated a risk of irreparable injury, that the Trustee is likely to prevail on the merits, that the balance of harms tips in favor of the Trustee, and that issuance of a TRO is in the public interest.

9. Regarding the Trustee's showing of irreparable injury, the Court finds that the property subject to the requested TRO consists of more than \$1 million in cash which is easily transferrable, and that Mr. Wright has a demonstrated history of transferring large amounts of cash, often, between his accounts. The Motion sets forth substantial evidence indicating that the transfers to Defendants occurred via the Debtor conducting a fraudulent enterprise. If the Debtor's estate ("Estate") were to ultimately prevail in this adversary proceeding, it could easily find itself unable to recover the cash in Defendants' bank accounts.

10. Regarding the Trustee's showing of whether he is likely to prevail in the adversary proceeding, the Court has reviewed the Opposition in detail. The Court finds that the Trustee has clearly carried his burden for the purpose of issuance of a TRO.

11. Regarding the balance of harms, the Court finds that the Opposition contains no explanation as to why Mr. Wright received the transfers identified in the Motion through entities not in his own name. The Court finds that issuance of a TRO in this instance is an appropriate balance of the harms. The Court also finds that it is appropriate to allow Mr. Wright to withdraw some amount for living expenses pending the hearing on the OSC.

12. Regarding the Trustee's showing that a TRO is in the public interest, the Court finds that this consideration is only remotely applicable to this adversary proceeding.

13. The case cited in the Opposition for the proposition that the Court lacks jurisdiction to issue a TRO, In re Regatta Bay, LLC, 406 B.R. 875 (Bankr. D. Az. 2009) was reversed on appeal, and further does not address whether an injunction may issue in connection with a fraudulent transfer.

For these reasons, the Court **ORDERS** as follows:

1. The Motion is granted.
2. The Opposition is overruled.
3. The Defendants are ordered to show cause at 11:00 a.m. on July 13, 2023, or as soon as counsel may be heard, in Courtroom 1368 of the United States Bankruptcy Court for the Central District of California, Los Angeles Division, located at 255 East Temple Street, Los Angeles, California 90012 (the "OSC Hearing"), why a preliminary injunction should not issue enjoining and restraining the Defendants, their agents, servants, employees, and attorneys, and others acting in concert or participating with any of them, from transferring, selling, assigning, pledging, hypothecating, encumbering, dissipating, distributing, without further leave of the Court, any personal or real properties in which any of the Defendants has any right, title or interest, including:

1 A. the contents of any deposit and other accounts at Wells Fargo Bank
2 in the name of any of the Defendants, including the following accounts identified by
3 name and last four digits of their account number:

4 William W Wright	0017
5 William W Wright dba Global Distribution Group	5999
6 William W Wright dba Hanover Associates	6193
7 William Wright dba Coastal Prime Associates	6185
8 William W Wright dba Tech Development Associates	0525
9 William W Wright dba Enumah Group	3342
10 William W Wright dba Enumah Group	5674
11 Enumah Group LLC	6196
12 AWB Consulting LLC	7496
13 New Beginnings Apostolic Community Church, Inc.	3797
14 New Beginnings Apostolic Community Church, Inc.	0293
15 Old World Antiquities LLC	4169
16 Sloane Street LLC	3751;

17 B. the contents of any deposit and other accounts at JP Morgan Chase
18 Bank in the name of any of the Defendants, including the account in the name of Enumah
19 Group LLC, with the last four digits 0831;

20 C. the contents of any deposit and other accounts at any other financial
21 institution in the name of any of the Defendants (collectively with the Defendants'
22 accounts at Wells Fargo Bank and JP Morgan Chase Bank, the "Defendants Accounts");
23 and

24 D. any of the real properties (collectively, the "Defendants Properties")
25 in which any of the Defendants has direct or indirect right, title or interest, including the
26 property commonly known as 22529 North Summit Ridge Circle, Chatsworth, California
27 91311-2673.

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1 4. The Trustee may file and serve on the Defendants and this Court a brief in
2 support of the OSC on or before June 22, 2023.

3 5. Defendants may file and serve on the Trustee and this court an opposition
4 to the OSC on or before June 29, 2023.

5 6. The Trustee may file and serve on the Defendants and this Court a reply
6 brief responding to any opposition to the OSC, on or before July 6, 2023.

7 7. Pending the OSC Hearing, the Defendants and their agents, servants,
8 employees, and attorneys, and others acting in concert or participating with any of them,
9 ARE RESTRAINED AND ENJOINED from transferring, selling, assigning, pledging,
10 hypothecating, encumbering, dissipating, distributing, or encumbering (1) the contents of
11 the Defendants Accounts, and (2) the Defendants Properties, except that Mr. Wright may
12 withdraw up to \$50,000 in the aggregate from the Defendants Accounts for living
13 expenses.

14 8. This TRO is effective immediately and, pursuant to Fed. R. Bankr. P. 7065,
15 the Trustee is not required to post security for the TRO.

16 9. This order must be served on the Defendants by overnight mail by no later
17 than 48 hours after this order is entered, and proof of service of this order must be filed
18 no later than 24 hours after the Defendants are so served.

19 10. The Trustee is authorized to serve this order upon Wells Fargo Bank and JP
20 Morgan Chase Bank.

21 11. The Trustee is authorized to record this order in the Los Angeles County
22 Recorder's Office.

23 **IT IS SO ORDERED.**

24 ###

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 333 South Grand Avenue, Suite 3400, Los Angeles, CA 90071.

A true and correct copy of the foregoing document entitled: **NOTICE OF LODGMENT OF ORDER OR JUDGMENT IN BANKRUPTCY CASE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* June 8, 2023 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Mark S Horoupian** mark.horoupian@gmlaw.com, mhoroupian@ecf.courtdrive.com;cheryl.caldwell@gmlaw.com;karen.files@gmlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Steven Werth** steven.werth@gmlaw.com, swerth@ecf.courtdrive.com;pdillamar@ecf.courtdrive.com,Karen.Files@gmlaw.com;patricia.dillamar@gmlaw.com

☐ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On *(date)* June 8, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Attorney for Defendants

Christopher Ellison (CA Bar No. 248545)
cellison@eaalawfirm.com
ELLISON & ASSOCIATES
6242 Westchester Pkwy, Suite 240
Los Angeles, CA 90045

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* June , 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 8, 2023

Date

Patricia Dillamar

Printed Name

/s/Patricia Dillamar

Signature

ADDITIONAL SERVICE LIST

2. SERVED BY U.S. MAIL

William Walter Wright,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

AWB Consulting LLC
Attn: William Walter Wright,
Agent for Service of Process,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

Enumah Group, LLC
Attn: William Walter Wright,
Agent for Service of Process,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

New Beginnings Apostolic Community Church,
Inc.
Attn: William Wright,
Agent for Service of Process,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

Old World Antiquities LLC
Attn: William Wright,
Agent for Service of Process,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

Amy Burrows-Wright aka Amy Barrios-Wright,
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

Sloane Street, LLC
Attn: Amy Burrows-Wright, Member/Agent
22529 North Summit Ridge Circle,
Chatsworth, CA 91311-2673

AWB Consulting LLC
Attn: William Walter Wright,
Agent for Service of Process
23055 Sherman Way, Unit 4025,
West Hills, CA 91308

Enumah Group, LLC
Attn: William Walter Wright,
Agent for Service of Process
23055 Sherman Way, Unit 4025,
West Hills, CA 91308

New Beginnings Apostolic Community Church,
Inc.
Attn: William Wright,
Agent for Service of Process,
23055 Sherman Way, Unit 4025,
West Hills, CA 91308

Old World Antiquities LLC
Attn: William Wright,
Agent for Service of Process,
23055 Sherman Way, Unit 4025,
West Hills, CA 913

Sloane Street, LLC
Attn: Mr. Steven A. Webb
as the agent for service of process
22543 Ventura Blvd., 220-14,
Woodland Hills, CA 91364

Martin Winfield
Winfield Law
6242 Westchester Pkwy, Suite 240,
Los Angeles, CA 90045